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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LEONARDO DUALAN, VALERIE)	CASE NO.: 2:14-cv-01135-JAD-NJK
KALEIKINI, ZOLTAN NEMETH, and JAMIN)	
VERGARA, individually and on behalf of those)	STIPULATION FOR EXTENSION OF TIME
similarly situated,)	TO FILE A JOINT PRETRIAL ORDER
)	
Plaintiffs;)	(FIRST REQUEST)
)	
v.)	
)	
JACOB TRANSPORTATION SERVICES, LLC,)	
a Nevada Limited Liability Company, D/B/A)	
EXECUTIVE LAS VEGAS,)	
)	
Defendant.)	
)	

COMES NOW, Plaintiffs, Leonardo Dualan, Zoltan Nemeth and Jamin Vergara, (“Plaintiffs”) and Defendant, Jacob Transportation Services, LLC d/b/a Executive Las Vegas (“Defendant”), by and through their respective counsel of record, and hereby request that this Court enter an order extending the deadline for the parties to file their joint pretrial order set forth in the Joint Discovery Plan and Scheduling Order [Document 18] pursuant to Fed. R. Civ. P. 16(b)(4). It is hereby stipulated as follows:

1. Plaintiffs filed their Complaint on July 10, 2014.

1 2. On September 19, 2014, the Court filed the Joint Discovery Plan and Scheduling Order,
2 which set forth, among other things, the deadline to file the joint pretrial order Friday, April 10, 2015.
3 [Document 18].

4 3. No trial date has been set in this case.

5 4. Since the Court filed the Joint Discovery Plan and Scheduling Order, the parties have
6 been actively conducting discovery during the first phase of discovery, which focused on Plaintiffs'
7 individual claims and discovery relating to class certification.

8 5. The parties have also used this time to enter into voluntary settlement discussions.

9 6. The parties now wish to engage in additional settlement discussions within the next 30
10 days, i.e., before May 10, 2015.

11 7. The parties agree that it is reasonable to briefly defer the cost and time required in
12 moving forward with a motion for class certification and/or preparing for a trial on the individual
13 claims.

14 8. The parties agree that the extensions requested will not operate as a prejudice to any of
15 the parties, and that this request to modify the current deadline is made with good cause, is in the
16 interests of justice and judicial efficiency.

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9. Therefore, the parties hereby stipulate and request that this Court enter an Order extending the deadline to file the parties' joint pretrial order from April 10, 2015 to May 10, 2015.

AGREED AND ACCEPTED:

Plaintiffs:

Defendant:

DATED this 10th day of April, 2015.

DATED this 10th day of April, 2015.

THE BOURASSA LAW GROUP, LLC.

JIMMERSON HANSEN, PC

By: Mark J. Bourassa, Esq.

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: _ April 13, 2015 _____

CASE NO.: 2:14-cv-01135-JAD-NJK